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ABSTRACT

This report of the guidelines, instructions, and procedures for Title I programs in Pennsylvania is divided into three major sections: Section one describes the organization, administration and procedures of the Pennsylvania State Educational Agency (SEA). Section two presents SEA guidelines for local school districts, dealing with (1) attendance area selection; (2) needs assessment; (3) planning, design, implementation and evaluation of Title I programs; and (4) Title I as a supplementary program. In section three information is provided on fiscal management, Title I application procedures, program numbers, the approval letter, application corrections and revisions, reallocated funds, annual performance report, carryover funds, comparability of schools, and concentration grants. Appendices include: a directory of Compensatory Education Division staff members; methods used in the selection of attendance areas; guidelines for explaining data sources used to determine low-income children; instructional activities and supportive services; maintenance and retention of records; Federal and State Title I policies and administration procedures in desegregated school districts; regulations concerning equipment, materials and supplies; and Title I forms for the 1981-82 school year. (Author/JCD)

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PENNSYLVANIA GUIDELINES INSTRUCTIONS AND PROCEDURES FOR ELEMENTARY AND SECONDARY EDUCATION ACT TITLE I PROGRAMS

(PART A-LOCAL EDUCATIONAL AGENCIES)

PUBLIC LAWS
89-10, 1965
92-318, 1972
93-380, 1974
95-561, 1978

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Compensatory Education Division
Pennsylvania Department of Education
July 1, 1981

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SECTION I

The State Educational Agency (SEA)

1. Organization and Administration: The Secretary of Education has delegated the overall responsibility for administration of ESEA Title I in Pennsylvania to the Commissioner for Basic Education. Primary and secondary responsibilities have been further delegated as follows:

   Bureau of Curriculum Services
   Telephone: (717) 787-8913

   Compensatory Education Division
   Telephone: (717) 787-7135
   Responsible for the direct administration of the overall Title I program, including program planning, development, approvals, operations and evaluation. Support is provided by the:

   Division of Educational Statistics
   Telephone: (717) 787-2644
   Responsible for determining the locale of low-income children so county grants can be allocated as determined by the U.S. Office of Education (USOE).

   Division of Educational Planning
   Telephone: (717) 787-7372
   Responsible for providing on-site evaluations and a report on each.

   Office of the Comptroller (Division of Federal Subsidies)
   Telephone: (717) 783-9072
   Responsible for disbursement of funds, monitoring expenditures and providing audit services.

   ESEA Title I Enforcement Officer
   Telephone: (717) 787-5500
   Responsible for resolution of formal complaints, requests for hearings and appeals and general supervision of ESEA Title I monitoring and enforcement activities.

2. SEA Responsibilities: In many ways, the state education agency (SEA) fulfills the same functions for local school districts with Title I programs that the Office of Education fulfills for the SEA. Among the SEA's responsibilities are:

   a. Performing its duties properly and efficiently under ESEA Title I, including compliance with its assurances to the Commissioner.

b. Administering the statewide Title I program, including ESEA Title I concentration grants.

c. Compiling reports from information submitted by local school districts to forward to the Office of Education, in accordance with the law and regulations.

d. Suballocating basic grant funds to eligible local education agencies.

e. Assisting local school officials in the development of projects.

f. Approving proposed projects in accordance with Title I regulations and program guides.

g. Maintaining fiscal records of all grant funds.

h. Disseminating pertinent information needed to assist in the planning, development, operation and evaluation of the program.

i. Initiating on-site evaluations and periodically monitoring ESEA Title I programs.

j. Insuring cessation of any illegal activities or services financed by Title I funds when such situations become apparent.

k. Investigating and resolving complaints about Title I activities or services.

l. Reallocating unused funds.

m. Requiring each LEA to provide a self-evaluation of its program at least once every three years.

n. Providing for the carry-over of unused funds from one fiscal year to the next.

o. Providing program information to the USOE, other public agencies, interested groups and individuals.

p. Preparation and submission of ESEA Title I monitoring and enforcement planning (including complaint resolutions and audits and audits resolutions) at least once every three years.

q. Reviewing supporting data and basic documentation pertaining to annual comparability report.

3. SEA Procedures:

a. New developments in Title I are annually presented by the SEA at the statewide conference of the Pennsylvania Association of Federal Program Coordinators. Workshops are also conducted in such areas as needs assessment, writing of behavioral objectives,

application procedures, fiscal management, comparability, etc. The conference is usually held in April and is considered to be of great value to both new and experienced Title I personnel. Costs incurred by LEA Title I personnel (including representatives from the Title I Parent Advisory Councils) attending the conference are legitimate Title I expenditures. Costs incurred by LEA personnel not employed by Title I (or represented by the Title I Parent Advisory Council) are not legitimate Title I expenditures, unless prior written approval is received from PDE. One exception in this law permits principals of buildings where Title I programs are conducted to receive inservice at Title I expense. Specific questions should be referred to PDE's ESEA Title I office.

b. A written announcement of LEA allocations is made as early as possible. Such allocations may be for tentative amounts and are based on the best information available at the time. This means the final allocation might be a lesser amount. Therefore, program planning by the LEA must be flexible enough to insure that activities can be curtailed with minimum effect on the educationally disadvantaged children who are in the greatest need of Title I services.

c. The SEA's announcement of allocations includes a package of forms, special information and other materials necessary to complete a program.

d. Completed applications, when received by the SEA, are date stamped; and acknowledgements are forwarded to the LEA within a few days. The acknowledgement indicates the data received and a fiscal year control number. The date of receipt is normally the date of project approval provided that the application is received in substantially approval form. The SEA reserves the right to adjust this date in cases where the application is substantially incomplete.

e. An application is given a preliminary review and forwarded to a regional reviewer, who reviews it for accuracy and compliance with regulations and guidelines. The reviewer will contact the LEA by telephone or letter, or make a visit, to assist in resolving any problems that might preclude approval of the program.

f. The program then is reviewed by the division chief, who may require additional adjustments or more information. The review procedure normally takes two to three weeks, depending upon the workload. If no further action is required, the program is approved. An official PDE approval letter is forwarded to the LEA and the comptroller. In some cases, approval may be conditional, with payment of funds delayed until the condition is met.

g. If at any time during the course of a program it becomes apparent to the SEA that an LEA is conducting activities or services that do not conform to the law, the SEA will advise the LEA that suspension of funds will occur unless the district can show cause within three working days that suspension is unwarranted. Failure on the part of the LEA to comply could result in an audit exception or additional audit exceptions.

h. In accordance within ESEA Title I Regulations, the SEA will investigate specific complaints from any source concerning a Title I program and will keep the LEA fully informed of the developments and any action to be taken, in the event the complaint is deemed justified.

i. The SEA will reallocate any available unused funds to those districts having the greatest need for additional funds. Application for these funds is made in accordance with PDE Basic Education Circular #123, August 13, 1974.

j. The SEA will furnish a standard form (DEBE-1169A, Part II, Annual Performance Report) to the LEA for a self-evaluation of the last program conducted. Instructions will be provided with the form.

k. The SEA will furnish, before August 31 of each year, forms and instructions concerning the carry-over of any unused funds to the next school year.

l. In accordance with Section 425 of the General Education provisions Act and Title I, Pennsylvania Code, Sections 31.1 to 35.251, the SEA will provide a formal hearing for any district aggrieved by the SEA because of: (1) disapproving or failing to approve its application or program in whole or in part; (2) failing to provide funds in accordance with the laws and regulations; or (3) terminating further assistance for an approved program for reasons contrary to federal or state law, rules, regulations and guidelines governing Title I which are published by the U.S. Office of Education or the Pennsylvania Department of Education.

SECTION II

SEA Program Guidelines

1. Reference: Educational Amendments of 1978 (P.L. 95-561)

2. General: Persons charged with administering Title I program must be familiar with the above reference. Other specific references appearing below should be included in the LEA reference file.

3. Selection of Attendance Area for Title I Projects:

   a. The LEA should collect data at the end of each regular school term to determine which schools are eligible for the next term.

   b. Each LEA will determine the low-income level on the basis of economic conditions in its area.

   c. The number of low-income children used to determine eligibility in attendance areas need not be in agreement with the number of formula children used to determine the Title I allocation.

   d. The LEA must keep records that substantiate the eligibility of each Title I target school. In addition to identifying children by address, the records must also show that the income level and identification data used were applied uniformly throughout the district. If more than one data source was used to determine the number of low-income children, the LEA must indicate whether or not any source was weighted. (For further clarification, see attached Appendix C). AFDC and free or reduced lunch program records will normally be the best data sources in Pennsylvania.

   e. Attendance areas--refer to the attached Appendix B.

      CAUTION: THERE HAVE BEEN SOME VERY IMPORTANT CHANGES IN THIS AREA--PLEASE READ CAREFULLY BEFORE PLANNING AND DEVELOPING YOUR TITLE I PROGRAM.

4. Comprehensive Assessment of Needs:

   a. PDE rates needs assessment among the highest of priorities in the development of a Title I program. Before proceeding with this crucial process, program managers must refer to the PDE position paper on needs assessment for ESEA Title I programs. (Current information will be included with annual application data).

   b. PDE takes no official position on the priority for particular groups of pupils, such as preschool, early elementary, later elementary and secondary. The comprehensive assessment of needs, if properly conducted, will bring the services to those

children with the greatest need, but it must be remembered that within certain school groupings it is illegal to "skip" an eligible school attendance area with a higher concentration of low-income children in favor of one with a lower concentration.

c. 1. When the needs of institutionalized neglected/delinquent children who have been counted in determining the LEA allocation are considered, it is necessary that the prorated share of their allocation be used solely for them. This does not mean that all the school-age children of the institution must be served. But it does mean that the prorated share of the allocation may not be used for other children in the district. If the needs assessment would so indicate, the LEA might decide to use the entire prorated allocation to serve only a percentage of the institutionalized children.

2. Title I regulations indicate that if the allocation of an LEA is based in part on such children in local institutions, a program must be provided for them.

d. When the needs of non-English speaking children are considered, Title I funds may be used for activities and services above and beyond those required in Chapter 5.24 of the General Curriculum Requirements of the State Board of Education.

5. Planning:

a. The LEA should prepare a list of local agencies that might provide certain health or welfare services. Representatives of these agencies should be invited to Title I planning sessions so that they not only become aware of needs but possibly offer assistance. However, no particular agency is required to be represented on the council.

b. In developing objectives, refer to the USOE "Handbook on Performance Objective--Title I, ESEA." This publication was previously mailed to all districts.

c. After objectives have been developed, they must be expressed in measurable terms and included in all project narratives. For additional information on objectives, please see the PDE paper on "Measurable Performance Objectives (Components and Examples)" previously distributed.

d. Districts wishing to integrate the Title I program as a regularly scheduled course must use the planned course format, submit course outlines for preapproval and follow the instructions provided under Option Four. Regional advisers will provide Option Four instructions upon request.

e. The LEA must present written evidence (page 8 of the application) that any activities specifically designed for handicapped children were coordinated with the Bureau of Special Education. This applies only to the regular school term. Only those activities which Special Education cannot fund may be considered for funding by ESEA Title I.

f. If the LEA allocation was based, in part, on a count of neglected or delinquent children residing in local institutions, a representative from each institution must be involved in the formal planning sessions.

Expenditures for capital outlay equipment should not exceed six percent of the total program budget; materials and supplies should not exceed ten percent. Title I funds budgeted in excess of these percentages must be justified in writing. Approval is made on the assumption that the equipment, materials and supplies will be used for the sole benefit of Title I children and in conjunction with an approved ESEA Title I program. Materials and supplies as used in this paragraph mean textbooks, audiovisual materials, library books and teaching supplies. All materials chargeable to 0229 or other budget categories will be carefully reviewed by PDE and may require justification if the total appears to be unreasonable, excessive, or imprudent.

g. The use of any Title I funds for construction is strongly discouraged. Before budgeting any amount for this purpose, submit a written justification to the chief, Compensatory Education Division.

h. The narrative portion of the application contains a description of methods used to disseminate information. Adequate records must reflect accomplishments in this respect.

6. Program Design:

a. To insure a concentration of services on a limited number of children, the LEA must spend a minimum of $270 on each child in a program, unless a written waiver is granted by PDE. To determine the maximum number of children who may be served, divide the total program budget by $270. Nothing in this policy precludes an LEA from spending somewhat more per child, although maximum concentration per pupil is considered to be $600 per child.

b. Priority use of Title I funds must be in the area of basic skills, which the PDE defines as:

-English/Reading

-English/Other Language Arts (Communication Skills other than reading)

-English/Second Language (ESL)

-Mathematics

-Preschool

At least 75 percent of the total budget must be devoted to the basic skills. In making this consideration include in the 75 percent figure overall program costs not included in the project costs on pages 6 and 6-1 of the application.

c. The PDE will use past evaluation data as evidence for determining Title I program approval.

d. Since evaluation is a continuous process, it is incumbent upon the LEA to recognize that Title I children ought not be "locked into" a Title I activity, especially when ongoing and positive evaluation results show that release from the activity is desirable. Make sure that all such children released are post-tested at the proper time according to empirical norm dates.

e. In considering participation of nonpublic school children, emphasize that the participating nonpublic child must reside within the attendance area of an eligible Title I public school, that the child must be educationally deprived.

f. There has been some misunderstanding about providing services to children enrolled in nonpublic schools outside the school district. If it is practical, and the child qualifies otherwise, the district in which the child resides is responsible for considering that child. Districts may, by contract, designate one district to provide services. Contact the PDE regional reviewer concerning accounting procedures to be used by district involved.

g. In those districts where all school attendance areas have been declared eligible for Title I services, all resident nonpublic school children must be accounted for on the application form.

h. The Title I application provides a page where nonpublic school authorities can indicate the extent of their involvement in planning the program. The application may be submitted without signature if the nonpublic school authority does not respond with the 15-day period. In most cases, however, program approval will be withheld until the PDE ascertains the reason for the nonresponse. PDE will not withhold program approval for nonresponse by those schools clearly indicated as "Old Order Mennonite" or "Amish" on the application form, since these authorities traditionally fail to respond. Any response pertaining to children enrolled in schools or eligible institutions under jurisdiction of the Roman Catholic Church must be made by an official of the appropriate diocese.

7. Implementation of Title I Programs:

a. The narrative portion of the application describes the in-service training to be conducted. It is mandatory, where teacher aides are employed, that specific provisions be made for teachers and aides to participate together in coordinated programs.

b. Details concerning the involvement of ESEA Title I Parent Advisory Councils are outlined in Section 125 of P.L. 95-561. Strict adherence to this section is required. The state has no flexibility regarding specifics spelled out in the law.

In general, the position of the Pennsylvania Department of Education is that parents of ESEA Title I children frequently have a better grasp of the psychological and physiological needs of their children than do school district personnel. On the other hand, school district personnel commonly are in a position to better understand the academic needs of children. If an effective ESEA Title I program is to result, all three of these elements must be in harmony.

The ESEA Title I application contains a page which requires the signature of the districtwide Parent Advisory Council chairperson.

For additional details concerning the involvement of parents in ESEA Title I, please review the ESEA Title I policy statements, specifically concerning parents as well as the PDE position paper on Electing and Organizing Your ESEA Title I Parent Advisory Committee. Please note that this paper now includes the four options for electing district advisory councils, as passed by Congress in P.L. 96-46.

8. Evaluations:

a. Members of Congress and other officials are becoming more demanding in evaluating the positive effects of Title I programs. While the PDE provides on-site monitoring and evaluations, the LEA must be prepared to provide a detailed performance report for each program year. A standard format (DEBE-1169A) will be provided for the evaluation. It is important that the information be submitted according to instructions accompanying the forms. This year the 1169A will be divided into 3 parts (2A, 2B, 2C). Please read the instructions included with each part. It may be more important than ever to complete these forms with the utmost care.

Failure to provide the data by the due dates specified on the DEBE-1169A) can result in a cut-off of further Title I funding.

9. Title I Supplements State and Local Funds:

a. The LEA must be certain that the Title I program is supplementary and that Title I funds must be used to provide instruction and services above and beyond that offered to the student body as a whole.

b. The Grant Agreement (pages 10 and 10a of the application) commits the LEA to the principle of providing supplementary services. Use of Title I funds to supplant state and local funds could result in severe audit exceptions.

SECTION III

Miscellaneous Information

1. Fiscal Management: Separate guidelines have been published for use by project directors and business office personnel.

2. The Application:

   Part 1 - DFBE-1169 (preliminary Data and Narrative)

   Part 2 - DEBE-1169A (Annual Performance Report)

   In Part 1, some of the data are estimated in order that the application may be submitted in advance of a new school year. All data are subject to verification and must be supported by working papers.

   In Part 2, formerly titled: Summary and Evaluation, data are based on actual performance. The information is used to satisfy federal reporting requirements.

3. Program Numbers: Each program is assigned a number by the PDE. It is important that the LEA use this number on all correspondence, revisions, fiscal documents and other materials pertaining to the program. The following is an example of the various components of the program number:

   Example: 48-0001-01-900-01 (or 01-C)

   48 = Federal Code for Pennsylvania

   0001 = Fiscal year control number (the first digit represents the fiscal year for which Title I, Part A funds were allocated; in this case, 1980). The remaining numbers represent the sequence of receipt by the PDE.

   01 = The alphabetical county code (01 - Adams through 67 - York).

   900 = The administrative unit number assigned by the PDE for all school districts.

   01
   or
   01-C = The "01" represents an individual LEA program, while "01-C" represents a cooperative program consisting of two or more districts.

   NOTE: Although an application may be approved with certain revisions for a three year period, a new number will be assigned annually for accounting purposes.

4. Approval Letter: The PDE does not send its official written approval to the LEA until the program has been completely reviewed and approved. The date that an application arrives in the PDE Title I office, in substantially approvable form, is normally the date of program approval. Under no circumstances may expenditures prior to that date be charged to Title I. The approval letter may indicate a tentative amount of funding. If, as a result of the final allocation, an increase or decrease of the tentative amount occurs, all districts will be notified accordingly; and they must submit a budget revision not to exceed the final amount. Upon PDE approval of the budget revision, the amount indicated in the approval letter is superseded by the total amount shown in the revision. A revised approval letter is not issued. This also applies if there is a grant of reallocated funds or a concentration grant is received subsequent to submission of the annual application.

5. Application Corrections and Revisions: While reviewing a program, the regional reviewer may make some corrections to the application. Corrected pages forwarded with the PDE approval letter are to replace the original pages in the LEA copy. During the operations of a program, the LEA may find it necessary to revise certain portions of the application to reflect a current situation. The regional reviewer must approve any changes.

   The following application (DEBE-1169) pages must be revised and submitted under the conditions stated.

   Page 2 - If the LEA decides, at any time after the program is approved, to expand the program by offering Title I services in an additional eligible school or schools, this page must be completely revised.

   Page 4 - This page should be submitted in accordance with the fiscal guidelines in the application package.

   Page 5 - Section A must be completely revised whenever staff members are added to or deleted from the program.

   Page 5 - Section B must be completely revised when items of equipment are added to or deleted from the program.

   Page 6 - This page must be completely revised when an activity or service is added to the program or when the estimated costs of any activity or service changes by more than 10 percent. Changes in numbers of children participating in an activity or service will be reflected in the Annual Performance Report (DEBE-1169A).

   Caution: If additional participating children will change the total unduplicated cost of participants, take care to ensure that the required $270 minimum per Title I child is not diluted, unless the PDE grants a written waiver.

Narrative: An addendum must be submitted if an activity or service is added to the program, or upon specific request by the PDE.

6. Reallocated Funds: Districts needing additional funds may apply for them under the provisions of Basic Education Circular #123, August 13, 1974. Funds for a fiscal year become available to districts after March 31 following the beginning of a fiscal year. Before requesting funds for a cooperative project, please contact the ESEA Title I Administrative Officer for additional directions.

   All requests are reviewed by a PDE panel, and a priority for funding is established by the review panel. Any district with a pending request should inquire about the status of the request before closing a program (i.e., submitting program fiscal completion reports). A grant of reallocated funds may extend the life of the original program beyond the normal August 31 closing date; in this case completion reports would not be submitted until both the basic final allocation and reallocated funds are used.

7. Annual Performance Report: All districts which conducted a regular or summer program during the past school year must submit a program summary and evaluation (DEBE-1169A) not later than August 15 each year. However, reading and mathematics scores from regular term Title I programs are to be submitted as soon as possible after the end of the regular school term. Annual test results for the summer term are to be submitted no later than October 15 each year.

8. Carry-over of Funds: Separate instructions will be issued prior to August 31 of each year.

9. Comparability of Schools: Services provided with state and local funds for free public education in a Title I school and a non-Title I school must be maintained at comparable (within 5 percent) levels at all times. All districts must maintain these levels to insure that they stay within the allowable limitation. Any new program may be approved if favorable comparability remains during the period following the submission of the last comparability report.

   Comparability Reports are due from every school district receiving Title I funds: (1) those districts not having project and nonproject schools within a grade span should submit two DEBE-1496 forms and one copy of Page 2 from their Title I application, no later than October 10, (2) those districts requiring detail comparability should submit two copies of DEBE-1495 and DEBE-1496 with a copy of Page 2 from their Title I application, no later than November 1.

   Should it be discovered that comparability was not maintained between October 1 and the date of the next report, all further ESEA Title I funding must be suspended, and a determination must be made as to the recoupment of any Title I funds expended during the time that comparability was not within the allowable limit. Please note that the Grant Agreement (pages 10 and 10a of the ESEA Title I application) commits the LEA to the maintaining of comparability.

10. Concentration Grants: Districts entitled to these grants in accordance with Section 117, P.L. 95-561 may receive such award at the same time as their basic grant (i.e., grants made to all districts). When this occurs the two grants are added and that amount becomes the total budget for the annual program. If the concentration grant is received after the annual application is submitted a district may claim the amount by revising the annual application in accordance with the following instructions. A separate application or fiscal account for the concentration grant is not required.

(How to Revise)

Page No. DEBE-1169	Remarks
2	Amend if services will be provided to eligible attendance areas not designated as sites where children were to be served in the original application for the year in question.
3	Amend only if the estimated unduplicated count of children shown in the original approved application will change and/or to adjust the prorated share for any institutionalized children. Prorating must be done as follows: -Add the basic and concentration grants. -Divide the total of above by the total number of Title I entitlement children shown on the allocation printout to arrive at a per child amount. -Multiply the per child amount by the total number of institutionalized children shown on the original proration sheet furnished for each institution with the basic allocation.
4	Amend the total amount of the budget to show the addition of the concentration grant. In the Remarks Section enter the words "Conentration Grant" and explain each line item change.
5	Revise to include any additional staff or instructional equipment added as a result of the use of concentration grant funds.
6/6-1	Revise to show (1) the addition of an activity, (2) a change of more than 10 percent in the estimated cost of an activity, in-service or the cost for parental activities, and (3) the increase of the total number of Title I participants by more than 10 percent.
7/7a	A new page must be submitted in all cases where the concentration grant is at least $1,000. Check only items 14 and 15 on page 7a. Enter the words, "Concentration Grant" in the Remarks Section.

9,9a,9a-1 If nonpublic school participants were included in the original approved annual application, revise page 9a-1 to reflect the new total budget. Forward a copy of the page to the nonpublic school authority(ies) with a letter of explanation for the adjustment. Include in the letter a statement that unless a response is received within 15 days that the district assumes the nonpublic authority is satisfied. Sumbit a copy of the letter and page 9a-1 to PDE as a part of the revised application.

20 Include a complete narrative only if a new activity has been added to the program. Submit addenda for any approved narratives submitted with the original application, if necessary.

NOTE: After the revised application has been approved, the PDE will furnish the LEA a signed copy of the revised program budget (page 4, DEBE 1169). No other approval document will be furnished.

APPENDIX A

Directory - Compensatory Education Division

Address all written communications to:

Compensatory Education Division
Pennsylvania Department of Education
333 Market Street
P. O. Box 911
Harrisburg, PA 17108

All staff members may be reached at:

(717) 787-7135

Chief

William M. Dallam

Administrative Officer

Kenneth Schmelzlen

Internal Fiscal and Comparability Coordinator

Robert Dornsife

Senior Program Officer - ESEA Title I Programs:

John M. Hyams - Reviewer for the following "Big Nine" School Districts and Westmoreland County

Pittsburgh	Altoona
Harrisburg City	Lancaster City
Erie City	Connellsville
Scranton	Allentown
Reading	

Regional Reviewers - ESEA Title I LEA Programs

Kenneth R. Miller	Region I - Counties of Bucks, Delaware (except Chester Upland School District) and Montgomery
James M. Sheffer	Region II - Counties of Carbon, Lehigh, Luzerne, Monroe, Northampton, Pike, Wyoming, Philadelphia and Chester Upland School District
Janet R. Straw	Region III - Counties of Adams, Cumberland, Dauphin, Franklin, Perry and York
Jeffrey C. Douville	Region IV - Counties of Bedford, Blair, Cambria, Centre, Clearfield, Clinton, Fulton, Huntingdon, Juniata, Mifflin and Somerset

Jacqueline B. Brown	Region V - Allegheny County (except Pittsburgh City School District)
James A. Holmes	Region V-A - Counties of Armstrong, Beaver, Fayette, Greene, Indiana and Washington
Karl E. Hope	Region VI - Counties of Butler, Clarion, Crawford, Erie, Forest, Jefferson, Lawrence, Mercer, Venango, and Warren
Paul C. Raffensperger	Region VII - Counties of Berks, Columbia, Montour, Northumberland, Schuylkill, Snyder and Union
Clarence T. Berner	Region VIII - Counties of Bradford, Cameron, Elk, Lackawanna, Lycoming, McKean, Potter, Sullivan, Susquehanna, Tioga and Wayne
Louisette Logan	Lebanon, Lancaster and Chester Counties

Public Information Officer

Geoffrey Yuda

Program Records and Processing Control Staff

Julie Bender	(Data collection, application receipt, summaries and evaluation. Also provides clerical support for Mr. Hope)
Brenda Foster	(Test scores and provides clerical support for Mr. Berner and Mr. Miller)
Patricia Gabriel	(Fiscal, application audits, carry-over and reallocation)
Joanne R. Kastelic	(Mail clerk, approval letter and program status)

Monitoring and Enforcement

Emogene L. Trexel, Esq.	(Enforcement Officer)
Diane DelSanto	(Provides clerical support for monitoring and enforcement. Also provides clerical support for Mr. Hope)

Administrative Assistant

Nancy Smeltz

Secretarial Staff

Cynthia Kofalt	(Secretary for Mrs. Brown, Mr. Holmes, and Dr. Logan)
Christine Savage	(Secretary for Mr. Hyams, Mr. Douville and Mr. Sheffer)
P. J. Miller	(Secretary for Mr. Dunn, Mr. Raffensperger and Miss Straw)

Programs Other Than ESEA Title I Part A Programs

1. Follow Through - Karl E. Hope
2. Migrant Education - Joseph E. Dunn
3. State Program for Educationally Disadvantaged - Nancy L. Smeltz

APPENDIX B

Selection of Attendance Areas - Section 122, P.L. 95-561

(1981-82)

IMPORTANT: At the time these guidelines were written, final regulations had not been issued. The following information is given in accordance with the text of Section 122, P.L. 95-561 and in part the Title I regulations of September, 1976. If any questions and problems arise during the target area selection process for 1981-82, contact the regional reviewer at once before documenting anything in the grant application: (See attached sheet)

Methods	What to Do
All	Collect resident and low-income data estimates for each attendance area, based on most current information available. Use uniform low-income criteria in all areas. Count all children 5-17 inclusive, regardless of what type school they attend--or even if not enrolled in any school. Compute percentage of low-income for each area and district as a whole.
"D"--No wide variance CAUTION: See remarks on last page of this appendix.	Try this first. (1) subtract low percentage area figure of low-income in district from high percentage area figure of low-income in district to find Actual Variation. (2) Multiply the districtwide percentage of low-income by .333 to find Allowable Variation. (See Exception #1)
"A"--Percentage	Compare percentage of low-income in each area with the districtwide percentage. Attendance areas with a percentage at least as high as the districtwide percentage are eligible. (See Exception #1)
"B"--Numerical	Compute the average number of low-income by dividing the total number of low-income in district by the total number of attendance areas. Attendance areas with a number of low-income at least as high as the average number are eligible. (See Exception #1)
"C"--Combination	If advantageous, try a combination of the percentage ("A") and numerical ("B") methods explained above. The number of areas eligible may not exceed the number that would be eligible if only one method ("A" or "B" above) had been used. (See Exception #1)

Exception #1

For methods "A", "B", "C" and "D" above. Instead of comparing to districtwide figures, compute percentage or average for each of the three school groups on the application and compare attendance areas within each group to that group's percentage or average.

Exception #2

CAUTION: See remarks on last page of this appendix.

If advantageous, check your 1979-80 and 1980-81 application to see if any ineligible areas in 1981-82 may continue to serve children under the so-called "Grandparent Clause." If an area was formerly eligible under the low-income criteria and served children, this exception may be used in the two succeeding years after that time. Mark such areas E* for the first succeeding year; E** for the second succeeding year. If the 1979-80 application shows areas Marked as E*, this exception could not be used again for such areas in 1981-82.

Exception #3

CAUTION: See remarks on last page of this appendix.

An attendance area with at least a 25 percent incidence of poverty may be declared eligible provided that the Title I expenditures for the current fiscal year in the area selected will equal or exceed such expenditures for the preceding fiscal year in that area. The same criteria must be used for all attendance areas in the LEA. When this exception is used areas meeting the expenditure qualification whose percentages of low-income are the highest take precedence over those with lower percentages.

Exceptions--Other

In case of problems complicating the selection of areas, such as desegregation, lack of well-defined attendance areas, clarification of the regulations, etc., contact the PDE regional reviewer.

Alternative Ranking

CAUTION: See remarks on last page of this appendix.

Under certain conditions, Section 112(2)(A)(B) permits an LEA to use an alternative ranking system to declare attendance areas eligible for Title I. The following steps are involved:

(1) Prepare a listing of areas ranked by numbers or percentages of low income children.

(2) Prepare a listing of areas ranked by numbers or percentages of educationally deprived children in accordance with criteria shown on page 11 of the application.

(3) Compare the two lists to determine if there is a substantially greater number or percentage of educationally deprived children in some areas that rank lower in respect to low income criteria. Then determine if those that rank higher on the basis of low income criteria have a substantially smaller number or percentage of educationally deprived children.

(4) Consider if alternative ranking were to be used if it would substantially impair the delivery of services to educationally deprived children from low income families in the areas that would not be served.

(5) If it is decided to use alternative ranking, make a list of the areas that will be served. (The number of areas on the list may not exceed the number that could have been served if ranking had been done strictly according to low income criteria.

(6) Present any decision to use alternative ranking at a formal DWPAC meeting. (The DWPAC must give its consent. See Item #11, page 7a of the application.)

(7) Contact the PDE regional reviewer as soon as possible, if DWPAC consent has been obtained (it is advisable to do this well in advance of submitting the application). Working papers showing the standings of all areas in respect to low income and educational deprivation criteria may be requested by the PDE. Tentative approval may be verbally granted on this basis).

(8) After tentative approval is received from PDE, prepare page 2 of the grant application in accordance with instructions on the reverse of the page. (When this ranking method is used and one or more areas are served in accordance with it, areas so ranked but not served will be marked as "I" (ineligible).

(9) Attach a statement to page 2 justifying the decision to use this ranking method.

Clarification
(Ltr. Re: CEP, USOE
2/25/77 to PDE

(1) An attendance area may consist of more than one building. The following illustrates <u>one</u> example of a multiple building attendance area:

School A - Grades 5-6

School B - Grades 7-8

School C - Grades 9-10

School D - Grades 11-12

(2) Some districts have only one attendance area because of a single building or because grades in all buildings are dissimilar; with no overlap of grades. In this case, check B.05 on page 2 of the application. One example of this situation is:

School A - Grades K-3

School B - Grades 4-5

School C - Grades 6-8

School D - Grades 9-12

<u>REMARKS</u>

Unfortunately, the final Title I regulations implementing P. L. 95-561 were suspended for 60 days at the time this information was written. If the suspended regulations should be adopted, there are some minor changes that will occur. Unless you receive some additional information in writing, please contact the regional reviewer or the Division Administrative Officer (717-787-7135) before using those methods and exceptions with a cautionary note. There is a <u>possibility</u> that Pennsylvania may not be able to use the 25 percent rule in 1981-82. Further clarification on this is being sought. The no well defined attendance area concept can no longer be used. Districts which previously used this method should contact the Administrative Officer in the Title I Office.

APPENDIX C

Explaining Data Sources to Determine Low-income Children

Page 2, Section C of the application shows how low-income children were identified. If more than one data source was used, an explanation must be attached to page 2 of the application. If a district marks more than one data source in the "Weight-Percent" column one of two kinds of situation occurs:

Situation One: The district simply has taken a count of all its AFDC children, its free/reduced lunch children and a count of children from other sources.* The district eliminates the duplication of names from the several lists and ranks the attendance areas according to how the names fall into the attendance areas. This is not weighting but a perfectly legal way to determine eligible buildings.

Example of the Type of Explanation Required: Our district chose not to weight sources since each source appeared equally reliable. We counted all the AFDC children, and the free/reduced lunch children appearing on the official lists and the children listed by the social worker and the school nurses from their records as being from low-income families. We eliminated the duplication of names. The remainder of the children was divided according to their attendance areas and the areas were ranked top to bottom, accordingly.

Situation Two: The district believes the free/reduced lunch list is not reliable, for counselors say many children will not sign up. The AFDC list is considered to be more reliable in this particular district. The administration and the parent council decide to count only 25 percent of the number of children on the free/reduced lunch list and 75 percent of the children on the AFDC. In addition, the parent council urges that the district not use a school survey technique to pick up other children, since one of the personnel involved has been indiscreet in mentioning names from a list that a school nurse developed the previous year. First, the district eliminated duplication of names from the free/reduced lunch list and the AFDC list. Second, the district listed all its attendance areas and placed the unduplicated children from both the lunch list and the AFDC list in their proper attendance areas. Third, the district went back through the attendance areas, counting only one of every four children from the lunch list and three of every four children from the AFDC list as they appeared in the attendance areas. The attendance areas then were ranked from top to bottom, with reduced numbers as the basis.

Example of the Type of Explanation Required: Our district used only the free/reduced list and the AFDC list as the basis for determining low-income distribution in the district. We decided to weight the free/reduced lunch list as 25 percent and the AFDC list at 75 percent, since the district considers the AFDC list to be more reliable as an indicator of low-income in this district than the free/reduced lunch list. At the request of the parent council, the district is not conducting a survey this year to identify additional children, since most of the children so identified represent duplications of names.

(*U.S. Consensus, housing, health, employment, school survey, other.)

APPENDIX D

Additional Instructional Activities and Supportive Services

The following are the only additional authorized instructional and/or supportive services which may be listed on page 6 (or 6-1) of the ESEA Title I application.

Activity	Remarks
Special Handicapped	May be added to page 6/6-1 if coordinated as described on page 8a of the application for a regular term project. Coordination for a summer term requires only prior approval of the PDE regional reviewer (see ESEA Title I Policy 44).

Supportive Services	Remarks
All Services	Participation in supportive services is strictly limited to children participating in a Title I instructional activity.
Arts	May be listed on page 6/6-1 with prior approval of the PDE regional reviewer. Narrative must clearly describe various forms of the arts involved.
Cultural Enrichment and Home/School Visitor	These may be added to page 6/6-1 of the PDE regional reviewer.
Psychiatric and Psychological	Costs must be computed on a case-load basis only and explained in the budget breakdown.
Library	May be listed on page 6-1 (summer only) with prior approval of the PDE regional reviewer. The narrative must clearly show that this service is limited to children in a Title I summer reading and/or math project.
Motor Sensory	May be listed on page 6/6-1 with prior approval of the PDE regional reviewer. This could also be a part of the methods and procedures for reading and math projects as clarified in the narrative; in this case it would not be listed on page 6/6-1.

Physical Education	May be listed on page 6-1 (summer only) with prior approval of the PDE regional reviewer. Be sure it is clear that the project should not be classified as motor sensory.
Special Handicapped	See same under activities shown above.

APPENDIX E

Maintenance and Retention of Records

The LEA must maintain the following separate sets of records:

1. Grant file (by PDE program number)

2. Property equipment inventory file

3. Comparability file (for those years when detailed reporting is required)

All records, except the inventory file and those pertaining to programs for which audit questions or exceptions are pending, shall be retained three years after a final completion report has been filed, but in no case less than five years after the activities and services funded under the program have terminated. In the case of audit questions or exceptions, the records will be retained until the questions or exceptions have been resolved, providing that the statute of limitations does not bar further need for such records. If inventory records are maintained by individual items on separate sheets or cards, the sheet or card pertaining to the item may be disposed of five years after the final legal disposition of the equipment or property. See important note at the end of this appendix.

All records shall be filed and indexed in such a manner that they may be easily reviewed by authorized local, state and federal authorities. Records are public information, except those pertaining to the performance of identified children and teachers. Copies of records must be furnished free to interested persons or at a reasonable cost (not to exceed the additional costs which are not covered by Title I funds). If copies cannot be furnished by the LEA, adequate arrangements must be made for reproduction of requested documents.

The PDE numbered grant file should contain a copy of all state and federal directives issued during the life of the program. In addition, the file must contain a copy of the grant application and all documents generated in connection with the program number concerned. Such documentation includes, but is not limited to, all fiscal accounting records, needs assessment records, attendance area selection worksheets, parent council minutes, records of dissemination, evaluation reports, test scores, correspondence, etc.

Rigid standards for contents of the comparability file are outlined in the regulations. Files must be maintained for individual schools and must demonstrate the maintenance of comparability for the entire school year. The contents must include appropriate resource records including:

1. Records of children's enrollment

2. Full-time equivalent number of certified and noncertified instructional staff members who are paid with state or local funds.

3. The total amount of state and local funds being expended on an annual basis for salaries for such instructional staff members less the amount of such salaries based on length of service (longevity) equaling what is commonly referred to as base salaries.

4. Building schedules for both traveling and nontraveling instructional staff members.

5. Exclusion data of special education and bilingual students including teachers and other staff members who serve these children.

The term instructional staff members means staff members who render direct and personal services which are in the nature of teaching or the improvement of the teaching-learning situation. The term includes teachers, principals, consultants, supervisors of instruction, librarians, guidance and psychological personnel. The term also includes aides or other paraprofessional personnel including clerical personnel employed to assist such instructional staff members in providing such services.

IMPORTANT NOTE

The suspended final Title I regulations of January 19, 1981 makes provisions for retention of Title I records which would override the provisions in EDGAR. Upon receipt of these guidelines, please do not dispose of any further Title I records before contacting the Administrative Officer of the PDE Title I Office (717-787-7135). Once the situation is clarified, it is very important the records be disposed of in accordance with the established schedule. Before proposing purchases of new filing cabinets please check to see how many cabinets might contain obsolete records.

APPENDIX F

Federal and State ESEA Title I Policies (1981-82 School Year)
Authority: Section 165 P.L. 95-561

1. Administration of ESEA Title I in Districts that have undergone desegregation
2. Administrative Responsibility: Assignment of
3. Application, Page 10 ("Contract for Title I ESEA Grant Award")
4. Audits: Payment for
5. Basic Skills Emphasis: Expenditure of Funds
6. ESL Components
7. Budgetary Expenditures
8. Carry-over Funds: Budgeting For
9. Carry-over Funds: Excessive Amounts
10. Certification of Title I Teachers
11. Complaints and Concerns of Citizens
12. Cooperative Programs
13. Consultant Fees
14. Continuation of Instruction
15. Contracts for Full-Time Title I Paid Teachers
16. Contracts For Services
17. Data Collection
18. Deadline Dates for Title I Application
19. Duration of Activities: Title I Instructional Programs
20. Employee Self Insurance Plan for Unemployment Compensation
21. Expectancy Level Formula Use
22. Field Trips Under Title I
23. Food Services
24. General Duties Performed by Title I Paid Personnel

25. Indirect Cost Rate

26. Inservice Education Costs

27. Interest Earned

28. Job Descriptions

29. Local School Board's Responsibilities Under Title I

30. Membership Dues Payment

31. Mobile Classrooms Purchase and Rental

32. Needs Assessment Information

33. Neglected/Delinquent Children

34. On-Site Evaluation Frequency

35. Parent Council Policies

36. Performance Objectives

37. Project Design

38. Pupil/Teacher Ratio in Title I Programs

39. Reallocated Funds Requests

40. Retirement Contributions for Title I

41. Revisions to Title I Application Page 2

42. Sabbatical Leave

43. Secondary Programs

44. Special Education Programs/Learning Disabilities

45. Staffing Title I Projects

46. Substitutes: Accounting For

47. Supervision Costs

48. Supplies and Equipment: Expenditures For

49. Supportive Services

50. Suspension of Funding

51. Target Area Selection: Working Papers Required

52. Termination Date for Title I Programs

53. Testing of All Children Prohibited

54. Tuition and Fee Payment from Title I

APPENDIX F

ESEA Title I Policies

1. The Administration of ESEA Title I in Districts that have Undergone Desegregation:

The information contained in School Administrator's Handbook, Major Code 42-000, Page Codes 42-200 through 42-250, April 16, 1971, is replaced by the following:

a. Problems concerning eligible attendance areas and serving children arising from desegregation plans should be reported immediately to the Chief, Compensatory Education Division.

b. Section 123(c) authorizes educationally disadvantaged children who begin participation in a Title I program, but who in the same school year voluntarily or through court order transfer to a non-Title I school, to continue participation in a Title I program for the duration of that same school year, if the local agency so determines.

c. Under a "follow the child" concept, children who reside in eligible attendance areas but who by specific arrangements attend schools serving ineligible areas, may be considered for participation in the Title I program, if the local agency so elects.

d. Title I funds are not to be used for the purpose of meeting the specific requirements of a desegregation plan. Nevertheless, the Title I program should have a positive effect on a district's desegregation program and should not in any event contribute to the maintenance or renewal of segregation. It is extremely important, therefore, that children be chosen to receive Title I assistance on the basis of a comprehensive and valid assessment of needs and not on the basis of race.

e. Title I projects must not be conducted in any way that would result in racial isolation of the children being served.

f. Title I services may not be offered on the premises of a segregated institution for neglected or delinquent children. This does not preclude serving such children on public premises provided that such programs also serve children from outside those institutions and that the children are selected for those programs on a non-discriminatory basis.

g. Section 420 of the General Educational Provisions Act, prohibits the use of any Title I funds for the transportation of students or teachers in any school or school system in order to carry out a desegregation plan or order.

2. Administrative Responsibility: Assignment Of

In all Title I programs there should be a person directly in charge of all the details involved in the overall administration of the Title I program, including the prompt and proper submission of forms and applications pertaining to the Title I program. This person may be full-time or part-time, depending on the size and the complexity of the program. Refer to policy #45 for additional information.

3. Application, Page 10 ("Contract for Title I ESEA Grant Award")

The ESEA Title I application, page 10 will not have to be signed for the 1981-82 school year, as a result of the 3 year application requirement. However, application, page 4 (budget) must have an original signature thereon (not xeroxed). The signature on page 4 will serve to indicate that the 1979-80 and 1980-81, page 10 contract(s) will be extended until the end of the legal obligation period for 1981-82 ESEA Title I funds.

4. Audits: Payment For

All terminated programs require a fiscal audit. The cost for this is budgeted in Account 0100 (Administration). A survey has revealed the average amount paid for an audit was less than one-half of one percent of the total program budget. Costs vary by locality and no fixed amount is specified. However, any cost for an audit must represent only the amount charged to audit the ESEA Title I account. If other accounts are audited at the same time and the LEA is presented a single billing for the service, the cost to ESEA Title I must be prorated.

5. Basic Skills Emphasis: Expenditure of Funds

Districts are required to expend a minimum of 75 percent of their allocations (tentative and/or final) in support of the basic skills (preschool, remedial reading, remedial mathematics, English as a second language, other language arts).

In addition, school districts are required to expend a minimum of $270 on each participating child. The maximum is $600. Expenditures approaching the maximum amount must be justified to the Division of Compensatory Programs.

This policy pertains to the unduplicated count of children divided by the tentative or final allocation.

6. ESL Components

A school district planning to use Title I funds to provide supplementary programs for children whose dominant language is other than English must assure the Title I Office of its adherence to provisions for effective ESL educational programs required in Chapter 5.24 of the

Curriculum Requirements of the State Board of Education, and the Guidelines for Educational Programs in the Commonwealth of Pennsylvania for Children Whose Dominant Language is not English.

7. Budgetary Expenditures

Expenditures for Title I projects (as set forth in the budget) must not be imprudent, extravagant, excessive or wasteful.

8. Carry-over Funds: Budgeting For

When budgeting for the final allocation, any anticipated carry-over must be projected for later use in one or more of the basic skills and shown on application page 6.

9. Carry-over Funds: Excessive Amounts

School districts may be requested to release carry-over funds in excess of 15% of their final allocation. Exceptions will be based on exceptional circumstances (i.e., prolonged strike, severe reduction in ESEA Title I funding, etc.).

10. Certification of Title I Teachers

The PDE requires that the applicable sections of the School Laws of Pennsylvania with respect to certification of teachers be followed.

11. Complaints and Concerns of Citizens

Listed below are the conditions under which PDE ESEA Title I staff may meet, in the field, with local school district citizens or other citizen groups that are concerned about local school district Title I policies and practices:

a. The local school authorities must be informed of the meeting and must be invited to attend.

b. The meeting must be open to the public.

c. The meeting must be held in a public place. School buildings, libraries, borough halls, etc., are acceptable. Private homes, restaurants or private business places are not acceptable.

12. Cooperative Programs:

One of the conditions for approval of a cooperative program by the PDE is that the school district or intermediate unit assuming the responsibility for operation of the program will continue to exercise full responsibility until such time as a final completion report (DEBE 86B) is filed for the program. This includes responsibility for the control of any carryover funds unless all participating districts agree in writing that the responsible agency may file a completion report and return any carryover funds to the Comptroller.

This does not preclude any district from the right to terminate participation in a cooperative prior to the beginning of a new program year, even though the control of any carryover funds is being exercised by another agency. Another condition for approval is that the agency exercising the fiscal and administrative control will maintain all records for the time period stated in these guidelines (See Appendix E). The PDE reserves the right to control the disposition of any Title I equipment in the hands of an agency when it relinquishes control of a cooperative program.

13. Consultant Fees:

As a general policy, the Title I office will authorize consultant fees of $75 a day. In the case of any higher amount, the district must provide justification. Such justification is usually based upon the daily salary of the consultant.

Expenses are not to be routinely attached to a consultant's fee but are to be presented separately on the basis of actual expenses incurred.

14. Continuation of Instruction

If districts wish to continue instruction for children who have progressed in the Title I program to the point of exceeding the criteria for educational deprivation listed on page 11 (b & c) of the Title I application, they may do so, provided:

a. The children were in the program the previous year.

b. The children currently live in an eligible attendance area.

c. The children are still achieving below grade level on standardized tests.

d. The current minimum expenditure per child provision is maintained for the program (that minimum is $270 for 1981-82).

e. The most educationally deprived children are served first.

f. The continuation of instruction will not take place for more than one consecutive year for any one child.

15. Contracts for Full-time Title I Paid Teachers

Title I paid teachers classified as professionals as defined by the Pennsylvania School Code shall have written contracts of employment approved by the school board. Any questions concerning such contracts should be directed to your regional reviewer.

16. Contracts for Services

School districts should be prepared to submit a written contract for any contracted service or, in the absence thereof, include a statement in the detailed budget breakdown which clearly describes the service and the rate involved, as a prelude to the actual submission of the written contract.

17. Data Collection

The Division of Compensatory Education requires each school district offering an ESEA Title I program to submit an Annual Performance Report (DEBE-1169A) to comply with Section 172 of Public Law 95-561.

18. Deadline Dates for ESEA Title I Application

a. Applications which are for regular term only: July 1, 1981. The approval date will normally be the date that all component parts of the application are received in the ESEA Title I office, in substantially approvable form.

b. Applications which are for summer term only: March 15, 1982. The approval date will normally be the date that all component parts of the application are received in the ESEA Title I office, in substantially approvable form.

c. Applications which are both regular and summer terms: Both may be submitted by July 1, 1981 or, if the LEA would prefer, the summer component could be delayed until March 15, 1982.

Special Note: The Title I office reserves the right to amend the approval date whenever, if upon review of the application, extensive additional data are required. A period of 30 days will be granted to the school district to provide requested data. If, upon expiration of the 30-day period, the LEA has not responded, then the approval date of the applications shall be the date the Title I office received the requested data in substantially approvable form.

19. Duration of Activities: Title I Instructional Programs

a. For regular term pull-out programs: These programs must be offered at least three times weekly for a minimum of 20 minutes of time on task for each instructional program. School districts are encouraged to increase both the number of meeting times and number of minutes for participation in ESEA Title I instructional programs. It is expected that no child will be in a Title I instructional program for more than two hours a day, irrespective of the number of ESEA Title I instructional components in which a child may participate.

b. For pre-kindergarten programs: No specific time requirements are imposed for these programs.

20. Employee Self Insurance Plan for Unemployment Compensation

Payment of Title I funds as a premium for a district self insurance plan to cover unemployment compensation has been authorized by USED, under certain conditions. The cost of premiums may not exceed the cost of premiums charged by other insurers (e.g. State unemployment compensation fund, BUCS, etc.) and the rate charged must be the same for Title I paid employees as it is for district paid staff members. Districts which have had such plans prior to 1981-82 may not buy back any premiums from current Title I funds. Please note nothing in the USED authorization provides that a district may use Title I funds for direct reimbursement payments to the State. Such payments are not allowable. (See EDGAR - Page 22599 - Section C.4d. - continued on Page 22600).

21. Expectancy Level Formula Use

Title I children may not be included in or excluded from a program through the use of an expectancy level formula. The expectancy level formula may be used only to set objectives for children who have been included in a Title I program because they are educationally deprived. Selection criteria are to be set by the school district on the basis of a needs assessment which includes objective testing, teacher survey and other sources.

22. Field Trips Under Title I

a. They must be in conjunction with an approved Title I basic skills component.

b. They may not be scheduled during the regular school day (only before school, after school or on Saturdays). Exception: Approved ESEA Title I summer programs.

23. Food Services

Prior to budgeting any Title I funds for food services, consult the Division of Food and Nutrition Services, PDE, (717) 787-3186, since USDA or other funds may be available to food services.

24. General Aid Duties Performed by Title I Paid Personnel

A. The 10% Provision

As long as Title I instructional time is not diminished, personnel paid by Title I funds may perform on a rotating basis such general duties as cafeteria supervision, bus duty, playgound duty, etc., for up to 10% of their daily contracted hours according to Section 134 of the Title I Law as amended October 10, 1978. The categories of personnel who qualify and the conditions under which the provision applies are as follows:

1. Title I Paid Reading Specialists qualify: In elementary programs they may rotate duties with either district paid reading specialists at the school into where they teach or with district paid elementary teachers who teach reading in the course of their regular duties. At the secondary level they may rotate duties with district paid reading specialists or teachers of English.

2. Title I Paid Math Teachers qualify and may rotate with either district paid math teachers or district paid teachers who teach math in the course of their regular duties.

3. Other Title I Paid Professional Staff such as counselors, home/school visitors, psychologists, etc., qualify if there are non-Title I paid professional staff with the same titles in the same building who perform the same duties.

4. Title I Paid Aides qualify if there are non-Title I paid aides situated in the same building.

B. General Prohibition of General Aid Duties

Except for the 10% provision and local district payment, Title I paid personnel may serve only Title I children. They may not work with non-Title I children in order to relieve a teacher to work with Title I children.

25. Indirect Cost Rate

An annually approved PDE Comptroller indirect cost rate and an acceptable dollar amount must be entered on the budget page (page 4) of the application. If a rate and dollar amount are not so shown, indirect cost may not be claimed on expenditure reports. The current year's approved rate must be used.

26. Inservice Education Costs

a. Type of Inservice

Title I inservice shall always be geared specifically to the approved Title I funded activities. These activities are listed on page 6 of the application. The purpose of Title I in-service shall be to develop competencies necessary to fulfill the project objective.

The staff of the ESEA Title I office reserves the right to require written descriptions of in-service activities which involve payment of Title I funds to non-Title I paid people. The authority for this memo is from Part 116.36 of the Federal Register of September 28, 1976, Right-to-Read Title I Cooperative policy and ESEA Title I state policy.

b. Persons for Whom Title I In-Service Funds May Be Used

Title I funds for in-service should generally be limited to those staff members paid fully or in part by Title I funds. However, in order to coordinate the Title I program with the regular program and to strengthen the Title I program, additional persons may receive payment from Title I. As long as it does not conflict with the local district policy, the persons and the conditions under which they may receive payment are as follows:

1. Title I Paid Staff, persons, including teacher aides, paid in whole or in part with Title I funds may be paid with Title I funds to participate in in-service. These people may receive in-service away from the district during the school year or summer if the in-service is designed to meet the requirements for working within a specific Title I project activity at some time during the project year. Title I paid aides must be provided in-service training with the professionals for whom they work.

2. Parent Advisory Council Members and Volunteers may receive training at or away from the school district. This cost must be budgeted under the 1100 account.

3. Locally Paid Specialists may receive in-service at or away from the school district if they work solely with children to be served with Title I projects.

4. The Principal of a Title I School may receive in-service at or away from the school district.

5. Classroom Teachers who Teach Title I Children may receive in-service at the district only. The two exceptions are in the case of regional or intermediate unit math or Right-to-Read in-service training sessions. The nature of these sessions must be remedial. When such in-service is paid for by Title I, the classroom teachers shall attend with the Title I paid staff.

NOTE: There are two types of inservice expenditures for staff members; (1) expenses such as those incurred for travel, lodging, registration, etc., and (2) personal compensation. Expenses should be shown in the 0231 category of the budget. Personal compensation must be included in salaries. Inflate salaries as deemed necessary to take care of any personal compensation for authorized non-Title I paid staff members. It is important to note that payment of personal compensation to any staff member is allowable only if it is an established district policy to pay such compensation to persons of the same job classification attending district funded inservice sessions. It should also be noted that federal regulations do not allow any expenditures of Title I funds to expenses incurred by school board members.

27. Interest Earned

Interest earned on deposits of federal grants received by an LEA must be accounted for by the LEA. The handling of interest income must be provided for on all federal programs making advance or scheduled payments to LEAs. It shall be the general policy that all LEA interest income must be refunded to the "Commonwealth of Pennsylvania" along with the Final Completion Report.

28. Job Descriptions

1. Prorated Staff

LEAs which have Title I staff whose duties are prorated (paid partly by Title I and partly by the local district) must submit with the application a job description showing what duties are funded by Title I and what duties are funded by the local district. If the prorated column on page 5 of the application is checked, job descriptions are then needed.

The purpose of the job descriptions for prorated staff is to assure that the prorated Title I duties do not supplant local district obligations. Thus, the descriptions should be clear and specific enough to show definite differences in activities.

Documentation substantiating the time spent on Title I duties must be maintained by the LEA.

2. Other Staff

For all other categories of staff paid from Title I there shall be job descriptions.

29. Local School Board's Responsibilities Under Title I

The local school board must annually grant authorization for the school district to conduct an ESEA Title I program and designate an authorized representative to file an application, on behalf of the school district. The Title I application should not be dated or submitted prior to the actual date of the board meeting. Minutes of the board meeting need not be submitted with the Title I application. In accordance with Section 124(i), page 2166, P.L. 95-561, the Title I application cannot be approved unless the application indicates that the school board was involved in the planning of the Title I program.

30. Membership Dues Payment

The use of Title I funds for payment of individual membership in any organization or group is not allowed. Membership in an organization or group is a matter of individual choice and is not directly related to the Title I program. Moreover, it is not the purpose of Title I to directly or indirectly foster or support any organization or group.

31. Mobile Classrooms: Purchase and Rental

PDE has been informed by the Pennsylvania Department of Labor and Industry that LEAs must have approval before purchasing either relocatable classrooms (full-size classrooms) or mobile classrooms (trailer-type units), or renting or leasing mobile units. Questions should be addressed to:

Division of Buildings
Bureau of Occupations and Industrial Safety
Department of Labor and Industry
Harrisburg, PA 17120
Phone: (717) 787-3806

In addition, the PDE's Division of Physical Plant and Construction must, by law, approve any such acquisition which comes under the jurisdiction of the Department of Labor and Industry.

32. Needs Assessment Information

a. The "Needs Assessment" portion of the ESEA Title I application must present reading and mathematics statistical data (numbers and percentages) on children through junior high school, as a minimum.

b. Title I cannot fund a districtwide general needs assessment.

c. The needs of both nonpublic children and N/D children shall be determined on a comparable basis to those of public school children.

For additional information concerning needs assessment, please refer to the "Position Paper on Needs Assessment for ESEA Title I programs in Pennsylvania," effective April, 1979.

33. Neglected/Delinquent Children

The PDE's responsibility is to assure that children in institutions for the neglected and delinquent get supplementary basic skill programs form either the public school or institution before any Title I funds for supporting services or other services are provided. If these children are actually enrolled in a basic skills Title I program in the public school or the institution on the same basis as the other Title I children, then they are also eligible for other services if funds are available and if, in the judgment of the PDE, the program is well within the Title I regulations.

34. On-Site Evaluation: Frequency

All Title I programs will receive either a PDE monitoring visit or an on-site evaluation every year.

35. Parent Council Policies

Title I law states that a formally organized parent council be elected at the building level where required and that every district shall have an elected district level council.

a. The minimum number of council members required for school buildings with 41 - 74 children participating in the Title I program is three. For 75 or more participating children, eight school advisory council members are required.

b. At least four district ESEA Title I Parent Advisory Council meetings must be scheduled during the fiscal year in which the Title I program is operational.

c. A formal (written) set of by-laws should be developed and distributed to each member of the council.

d. Parent council meetings should be scheduled sufficiently in advance of the application deadline date that parents are given an opportunity to make recommendations about the application.

e. Parent council members should not be asked to make final recommendations regarding the Title I program at the same meeting at which the Title I application is initially presented.

f. School districts are required to maintain written minutes for all parent council meetings at both the district and building level.

g. The Division of Compensatory Programs strongly recommends that parents (or guardians) of participating children be informed of, in a form letter, of their children's eligibility for the Title I program and of what programs and services will be offered. Parents should be given an opportunity to return the form letter to indicate their willingness or unwillingness to have their children participate in the Title I activity.

For additional information, refer to Pennsylvania's position paper on Electing and Organizing Your ESEA Title I Advisory Committee based on P.L. 95-561, The Educational Amendments of 1978.

36. Performance Objectives

One hundred percent of the students who participate in Title I must be accounted for in the written measurable performance objectives. Although it is recommended that the objectives for each program be limited to few in number, at least one of the major objectives must be expressed in terms of grade equivalency gains expected for participating children.

37. Project Design

The ESEA Title I project may not be designed to meet, nor will it have the effect of meeting, the general needs of schools or of the student body at large in a school or of a specified grade in a school except for approved schoolwide projects.

38. Pupil/Teacher Ratio in Title I Programs

Each Title I instructional group should be approximately five pupils to one instructor (or aide). A ratio in excess of ten to one will require a written explanation.

39. Reallocated Funds Requests

Funds not used by districts will be reallocated at various times each year. Those times will be determined largely by the money which becomes available. It is important that districts release unused funds as quickly as possible so that the funds may be reallocated in time for other districts to use them.

For additional information concerning reallocated funds, please refer to Basic Education Circular 123 of August 13, 1974, which is still in effect.

NOTE: The forthcoming final federal regulations (45 CFR 116a) may limit the scope and schedule of reallocation. Districts will be notified of any such changes.

40. Retirement Contributions for Title I

According to a September 13, 1976 memo form the Secretary, Public School Employes' Retirement System, "Under the provisions of Act 96 of October 2, 1975, a reporting unit will only be responsible for its share of contributions for members employed under a federal program.

41. Revisions to ESEA Title I Application, Page 2 (Part 1)

If, at any point in the year, LEA's revise page 2 (Part 1), they are required to review their comparability in light of the revision. A letter (or memo) should be forwarded to the PDE's Title I office, indicating that the comparability status has been reviewed, that it continues to be favorable, and that supportive documentation to this effect is on file in the school district.

42. Sabbatical Leave

Sabbatical leave may be approved provided the district has sufficient funds being carried over to honor the request or the district can demonstrate that the sabbatical leave request will not diminish the Title I program. Submit requests in detail to the chief, Compensatory Education Division.

43. Secondary Programs

The Division of Compensatory Programs encourages secondary instructional programs at the secondary level where the needs assessment indicates the students are educationally deprived and where funds permit. Please communicate with your regional reviewer concerning the options for implementing reading and mathematics programs at the secondary level.

44. Special Education Programs/Learning Disabilities Activities

a. Regular school year programs: LEA's have no authority to fund any regular school year special eduation/learning disabilities activities under ESEA Title I without first reviewing such plans with the appropriate ESEA Title I regional reviewer. Districts may write to their regional reviewer for more detailed clarification on this subject.

b. Summer programs: Since no special education funds are available for summer programs, LEA's need only have special education activities reviewed and approved by the appropriate ESEA Title I regional reviewer.

c. Programs under Section 504 of the Rehabilitation Act

ESEA Title I is not regarded as a related service under Section 504 of the Rehabilitation Act. Districts that receive inquiries about receiving services under this act should write a letter of inquiry to the Division of Compensatory Programs. Each inquiry will be handled on an individual basis.

45. Staffing Title I Projects:

a. Compensation

Compensation for personal services, including employee fringe benefits is payable at a rate not exceeding that established for district paid employees of the same classification.

Any additional compensation or benefits for Title I paid employees is authorized only if established district policy or district employee agreements provide the same additional compensation and benefits to district non-Title I paid employees of the same classification.

b. Restrictions on Services

Services of ESEA Title I paid persons must be commensurate with the full-time equivalency status indicated in the approved grant application (DEBE 1169). Amounts charged to Title I or personal services, regardless of whether treated as direct or indirect costs will be based on payrolls documented and approved in accordance with generally accepted state and local

practices. Payrolls must be supported by time and attendance or equivalent records for individual employees. Salaries and wages of employees chargeable to more than one grant program or other cost objective must be supported by appropriate time distribution records. The method used should produce an equitable distribution of time and effort. Except as provided for in Section 134, P.L. 95-561 and only when such exceptions are documented in the grant application, the duties of Title I paid persons are restricted to children participating in the Title I program, consistent with the full-time equivalency status of the persons.

c. Professional Staff

Title I teachers and other staff such as counselors and psychologists shall be certified in accordance with Section 1202 of the School Laws of Pennsylvania. These professionals should have training and experience in working with educationally deprived children. They should be both competent and able to relate well to Title I children.

It is recommended that Title I teachers and/or supervisors, especially in the areas of reading, language arts or math, should have had formal courses and/or equivalent experience in teaching methods and materials for educationally deprived children. Such courses and/or experiences should help these professionals provide a variety of instructional methods and materials. This should in turn allow and stimulate a school to vary its methods of instruction.

d. Title I Paid Aides

1. Work with Title I children

Title I aides may work with Title I children only. They may not work with nonTitle I children in order to allow teachers to work with Title I children.

2. Work for professionals

Title I aides must work for and assist the professionals who are assigned instructional or supportive service duties for Title I children. In Title I reading programs aides shall assist either Title I paid or local district paid certified reading specialists who do the Title I instruction. In math programs they shall assist Title I paid math teachers or district paid teachers who are assigned the Title I instructional duties. In all other programs aides shall work for and assist the professionals who are assigned the instructional or supportive service duties.

3. Most effective assisting in the instructional process

The PDE feels aides can provide the most effective service to Title I by assisting in the instructional process. Such assistance shall be performed at the direction of and under the immediate supervision of professionals for whom they work.

4. Duties of aides

Acceptable duties of Title I aides include:

a. Performing instructional drill work assigned by professionals

b. Maintaining Title I records

c. Correcting Title I tests, workbooks, etc.

d. Making teacher-made materials

e. Setting up and monitoring the use of Title I audiovisual aids

f. Maintaining Title I bulletin boards and displays

g. Performing various Title I clerical and housekeeping duties

h. Assisting in the monitoring of Title I approved field trips

i. Escorting Title I children to and from classrooms

5. Written job descriptions

It is important that school districts have written job descriptions for all aides employed under Title I and that these aides fully understand the restrictions under which they may offer service.

6. Inservice training required

As a condition for the approval of projects involving the use of aides, existing ESEA Title I law specifically require training programs in which both aides and professional staff participate.

A portion of the aides' training should include orientation to the school, faculty, and student population. Aides should also be trained in the use of Title I materials and methods. Special emphasis should be placed on the use of these materials and methods with educationally deprived children.

7. Services to be supplemental

Title I aides must supplement the school district's regular program. If a school district hires aides with its own local money, the aides must provide services to all children including Title I children. The activities of Title I aides must be different from or additional to the activities of the locally paid aides. Job descriptions in the grant application must document this distinction.

8. Hiring of Title I Aides. Parents of eligible Title I children or older siblings who would be eligible to receive benefits under the provisions of Title I should be given priority consideration for employment as aides. Evidence shows that employment of parents of eligible Title I children results in better school relationships with all Title I parents and higher attainment by the project participants.

e. Payment of Clerks or Secretaries

Salaries of personnel working in the administrative office (clerks or secretaries) may be paid partly from Title I funds if these persons are required to work beyond their usual hourly assignment or if they occupy a position needed to perform the clerical and secretarial duties for Title I projects. The usual procedure, however, is to reimburse the general fund if the district has an approved indirect cost rate. If the school district has not applied to the Comptroller's Office for an indirect cost rate, it should do so without delay. When a school district does not have an approved rate, it usually bears the above costs from the general fund account.

46. Substitutes: Accounting For

Do not show estimated numbers of substitute staff members in the application (DEBE 1169) or actual numbers in the annual performance report (DEBE 1169A). Inflate salaries as deemed necessary to account for the use of substitutes. Such persons must be identified on the Final Expenditure Record and Report (DEBE 61).

47. Supervision Costs

It is possible to attribute to Title I the cost of a person (other than a program person) who has been assigned the responsibility of preparing the Title I narrative, submitting the application, forms, etc. This cost appears on page 5.

Supervisory personnel on 12-month contracts without fixed hours of employment may not be partially paid from Title I. However, it may be possible to:

a. Place the person on a contract which specifies hours and/or days, making them eligible for overtime compensation or prorated salaries. Consult with regional reviewer concerning an acceptable type of contract.

b. Pay the person completely from Title I funds if the project allocation and the project's size and complexity are sufficient to allow this.

48. Supplies and Equipment: Expenditures for

a. Supplies: Generally, 10 percent of the total budget is the maximum allowable amount within the following 0200 budget categories: 0200 (teaching supplies); 0221 (textbooks); 0223 (library books); and 0224 (audiovisual materials and supplies).

b. Equipment: Generally, six percent of the total budget is the maximum allowable amount within the 1200 expenditure account. Items may not be added or substituted unless a revised equipment list (page 5 of DEBE-1169) is substituted and approved by PDE. Equipment should be ordered in time to insure that it can be placed in use at least 60 days prior to termination of activities and services for the program year.

In order to avoid an audit exception, make your request for any waiver dealing with equipment, materials or supplies in writing to PDE for approval.

49. Supportive Services

The PDE will maintain tight control over supportive services funded under ESEA Title I. Only those children who are actually in Title I basic skills programs may receive supporting services of any type (i.e., medical, dental, psychological, counseling, etc.).

The general rule will be that fewer than 25 percent of the children actually participating in the program probably need the kind of supporting service that would justify the employment of a person full-time or part-time. Where only a few children need the service, the PDE is prepared to accept calculations of supportive services on a case-load basis.

In order to justify a full-time position in the supportive services (e.g., home-school visitor, guidance counselor, psychologist, etc.), 120 to 130 children would have to be served. This means that after the duplicated count (shown on page 6) is divided by four, if the final figure is not between 120-130, then the supportive service position would have to be less than full-time.

50. Suspension of Funding

School districts are advised that ESEA Title I funds may be denied or suspended under one or more of the following circumstances:

a. Failure to submit required carry-over forms.

b. Failure to include a statement in the application regarding how the eligibility of buildings was determined.

c. Failure to submit the annual Title I performance report for the previous year.

d. Failure to submit the comparability form.

e. Failure to write program objectives in measurable performance terms.

f. Failure to submit the fiscal reporting forms.

g. Failure to adhere to existing federal and/or state policies and directives pertinent to ESEA Title I.

h. Alleged violations of either supplanting or general aid.

i. Failure to update estimated fiscal effort figure by December 31 following the submission of the application (see page 1 of DEBE-1169). See Policy 23.

j. Failure to reach mutual agreement with the nonpublic school authority in ESEA Title I cost sharing as required in section 130(a), P.L. 95-561.

51. Target Area Selection: Working Papers Required

Federal program auditors have made it quite clear that the following procedure must be checked annually:

> The procedure to determine how individual buildings were determined to be eligible must be available for examination by on-site evaluators. There must be working papers and evidence of a consistent method in use.

52. Termination Date for ESEA Title I Programs

All 1981-82 ESEA Title I programs will end August 31, 1982, unless authorized to carry over funds to the 1982-83 term.

53. Testing of All Children Prohibited

Testing of all children in an eligible Title I school is not a permissable expenditure of Title I funds. Title I funds may not be spent until the LEA initially selects those children whom it considers to be educationally deprived according to specified criteria selected

by the district. Once the disadvantaged children have been identified, Title I funds may be used to gather additional data to diagnose their particular needs, to determine the specific services to be offered, and, on the basis of such data, to select from the educationally disadvantaged those children who will actually receive services corresponding to their needs. Two exceptions to this are:

a. Prekindergarten Title I program: If a district has a locally operated kindergarten program but no prekindergarten program for younger children, it may use Title I funds to provide the initial screening of children who will participate in the prekindergarten Title I program.

b. Kindergarten Title I program: If a district has no locally operated kindergarten or prekindergarten program, it may use Title I funds to provide the initial screening of the children who will participate in the kindergarten Title I program.

c. The Title I-funded evaluation may extend only to active participating students; however, districts electing Model B or C may use Title I funds to test the necessary comparison groups. Read evaluation regulations for details.

54. Tuition and Fee Payment From Title I

Pending adoption of several new federal regulations, tuition fees collected from Title I paid staff members will not be allowed as a Title I expenditure.

APPENDIX G

Equipment, Materials and Supplies

1. References: Appendix B to EDGAR (Education Department General Administrative Regulations as published in the Federal Register (FR) of April 3, 1980

EQUIPMENT

Subject	Section	FR Page No.(s)
- Definition	74.132	22590

Note: Legal counsel has advised that the Pennsylvania School Accounting Manual definition may be used instead of the EDGAR definition.

- Disposition	74.139	22591-2

Note: PDE recommends that a listing of equipment being disposed of be furnished to The Division of Compensatory Programs. The list should show the date of purchase, cost of each item and date of disposition. The listing will be filed in the official state record copy of the Title I application for the year that disposal took place.

- General	74.135	22590
- Inventory	74.140	22592

Note: PDE recommends that an inventory be made annually, instead of once each 2 years. It is also recommended an inventory be made when there is a change of Title I project directors.

- Loss/Damage/Theft	74.140	22592
- Maintenance	74.140	22592
- Management	74.140	22592
- Records	74.140	22592

Note: Also see Sec. 74.22, FR page 22579

- Replacement	74.138	22591
- Transfer	74.136	22591
- Using	74.137	22591

2. General:

All ESEA Title I equipment, materials and supplies must be used only for Title I purposes and be under the control of a public agency. Approval by the SEA for purchases is based on requirements documented in the grant application (DEBE-1169). Any questions concerning the acquisition or disposal of equipment, materials and supplies should be directed to the PDE in writing.

3. Limitations on Purchases:

Purchases of materials and supplies (textbooks, audiovisuals, library books and teaching supplies) are limited to 10 percent and new equipment to six percent of the overall program budget for a fiscal year. PDE will consider waivers if a written justification is presented. All purchases should be made not later than 30 days prior to the termination of a program, with the exception of small amounts of materials and supplies available locally and necessary for the completion of a program. The LEA does not have the authority to add new items not indicated in the original budget breakdown or in a revision. Stockpiling for future programs is not permissable.

4. Procurement Standards:

Procurement standards will be in accordance with the same legal standards employed by the LEA to make purchases with state or local funds. Contractual and administrative issues or disputes arising out of ESEA Title I procurements must be reported to the PDE in writing.

5. Advance Purchases of Materials and Supplies:

a. The LEA may purchase such items as textbooks, audiovisual material and teaching supplies with its own funds prior to the program approval date and then make them available to the Title I program at the documented sales price, provided the LEA does the following: (1) the LEA must be shown as the vendor on program expenditure records (DEBE-61) and (2) any entry shown on the DEBE-61 must be dated on or after the effective date of program approval.

b. Such materials and supplies must be itemized in the proposed budget breakdown submitted with the grant application (DEBE-1169).

c. If any of the materials and supplies itemized in the proposed budget breakdown are not approved by PDE, Title I funds may not be used to reimburse the LEA for the purchase of any such item(s).

d. Any items purchased in advance must not be used prior to the effective date of program approval.

e. This procedure does not apply to the advance purchase of equipment (nonconsumable property).

6. Acquisition Costs of Equipment:

This means the net invoice price of equipment, including any attachments, accessories, or auxiliary apparatus necessary to make the equipment usable for the purpose for which it was acquired. Other charges such as taxes, duties, protective in-transit insurance, freight or installation shall be included in, or excluded from, the acquisition cost, in accordance with the district's regular accounting practices.

7. Equipment Lists:

DEBE-1169, page 5, Section B, must be revised and submitted to the PDE each time an item is added or a substitute is made, except for substitutions for like items, which remain within the scope of the amount budgeted for the equipment.

8. Lease/Purchase Equipment:

Lease/purchase equipment is not to be shown on page of DEBE-1169, but must be shown in the initial budget breakdown or remarks section of a budget revision and charged to the 0800 account. Such equipment will be accounted for and treated the same as all other ESEA Title I equipment. A copy of all lease/purchase agreements must be submitted with the grant application (DEBE-1169), or a budget revision.

9. Replacement Equipment:

Equipment previously bought with ESEA Title I funds may be replaced with Title I funds, if necessary. Any trade-in value of the like item will be applied to reduce the cost. This equipment is not to be shown on page 5 of the DEBE-1169, but must be indicated in the initial budget breakdown or remarks section of a budget revision and charged to the 0643-644 category of the budget.

10. Marking of Equipment:

All equipment must be marked with the letters "ESEA Title I" and with any identification number, if the item does not have a manufacturer's serial number.

11. Equipment Records:

Accurate records must be maintained for each item of equipment. Records should be kept at a central location.

12. Equipment on Nonpublic Premises:

Only portable or movable items of equipment may be placed on nonpublic school and local institution premises for Title I purposes. The LEA retains the title to all such equipment and assumes total responsibility for it. When the equipment is no longer needed for Title I, the LEA must remove it from the nonpublic premises. This

does not mean that it must be removed at the end of a school year if it seems likely that it will be used during the following year. Special care will be taken to insure that any such equipment is marked and inventoried in accordance with these guidelines.

13. Supplies - Please refer to above cited edition of EDGAR:

Subject	Section	FR Page
- Definition	74.132	22590
- Disposition	74.141	22592
- General	74.135	22590

14. Reorganized School Districts:

If a merger or consolidation of districts takes place, any equipment, materials and supplies bought with Title I funds will become the property of the surviving or consolidated districts. Such districts will be accountable for the property and the management of it in accordance with these guidelines.

15. Sale Procedures for Surplus Equipment:

Sales of surplus equipment will be in accordance with the same legal standards employed by the LEA in selling district property. Such standards must provide for competition to the extent practical and result in the highest possible return. Any questions or problems on this must be reported to the PDE in writing.

16. Cooperative Programs:

The title to equipment purchased for a cooperative program will be vested in the LEA for which the equipment was originally purchased. Prior to making any disposition of property for purposes other than Title I use, the administrative and fiscal agent designated for the program must ascertain that another district in the cooperative does not need the equipment for its Title I program. If another district can use the equipment for Title I purposes, it will be made available on a loan basis. Records will reflect the loan. Any ultimate benefits derived from the legal disposition of such equipment will accrue to the district for whom the equipment was originally purchased. The same procedures shall also apply to materials and supplies in the event that a surplus accumulates.

The administrative and fiscal agent is responsible for the management of all Title I property as long as an agency continues to participate in a cooperative venture.

APPENDIX H

Title I Forms for 1981-82 School Year

In Chronological Order of Submission

DEBE Form	Due Date	Remarks
1169A (see below)	See below	Form has been divided into 3 parts as shown below. Previous editions are obsolete.
1169A (1981 - new) Part 2A	6-15-81	Annual Performance Report. Consists of regular term test score data for 1980-81. Send to Title I Office.
1169 (being revised)	7-1-81	Title I Application. Minor changes on pages 4 and 11 only. Previous edition of all other 80-81 pages may be used. Send to Title I Office.
86 (being revised)	7-10-81	Preliminary Completion Report. Last date for 1979-80 carry-over program. Send to Comptroller.
1169A (1981 - new) Part 2B	8-15-81	Annual Performance Report. Consists of statistical data other than individual achievement data. Applies to regular and summer programs. Send to Title I Office.
988 (3/78 or 3/80)	9-10-81	Carryover Request. Submit as early as possible to insure better cash flow. Recommend form be submitted UNDER SEPARATE COVER at the same time as the 1981-82 Title I application is submitted. All dates on page 2 must be changed to reflect the current situation. Send to Title I Office.
86 (being revised)	9-10-81	Preliminary Completion Report. Submit for 1980-81 program; ONLY IF THERE WILL BE NO CARRYOVER. Attach refund check payable to the Commonwealth of Pennsylvania, if applicable.

DEBE Form	Due Date	Remarks
105 (3/80)	10-10-81	Reconciliation of Cash. Submit separate forms for active 80-81 carryover and for 1981-82 program. Send to Comptroller.
988 (3/80)	10-15-81	Carryover Request. Submit revision only if total amount of initial request varies by more than 10 percent.
1169A (1981 - new) Part 2C	10-15-81	Annual Performance Report. Submit summer term achievement data only. One-third of Pa. school districts, as shown on the form, must submit a self evaluation for the 1980-81 program year. If there was no 1980-81 summer term and if your district is not on the listing of districts - do not submit. Others send to Title I Office.
86B (3/79)	1-1-82	Final Completion Report. This is the last date to submit for the 1979-80 program. Send to Comptroller.
61 (3/75)	1-1-82	Expenditure Record and Report. Attach this to the 86B shown immediately above. Send to Comptroller.
105 (5/80)	1-10-82	Reconciliation of Cash. Submit separate forms for active 80-81 carryover program and for the 1981-82 program. Send to Comptroller.
86B (3/79)	3-1-82	Final Completion Report. This is the latest date to submit for a 1980-81 program with no carryover. Send to Comptroller.
105 (5/80)	4-10-82	Reconciliation of Cash. Submit separate reports for active 1980-81 carryover and for the 1981-82 program. Send to Comptroller.

DEBE Form	Due Date	Remarks
1169A (See remarks) Part 2A	6-15-82	Annual Performance Report for 81-82 regular term. Consists of regular term test score data for the 1982-83 regular term. Districts will be notified of any changes prior to due date. Send to Title I Office.
987 (9/80)	As needed	Request for Reallocation. Form furnished upon request. Send to Title I Office.

Note: Please see Fiscal Guidelines, July 1, 1979, as amended by Change Notice No. 1, July 1, 1980 and Change Notice No. 2, July 1, 1981.